

FAX or Internet

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UNITED STATES DISTRICT COURT  
for the  
District of Arizona

In the Matter of the Search of:

A single family one story home beige in color with a brown roof. The residence is listed as NHA 31 in Wetherill Heights located in Kayenta, Arizona with GPS coordinates 36.723981, -110.26456.

)  
)  
) Case No. 23-4088 mb  
)  
)

**ELECTRONICALLY ISSUED SEARCH AND SEIZURE WARRANT**

To: Any authorized law enforcement officer.

An application by a federal law enforcement officer or an attorney for the government requests the search of the following person or property located in the \_\_\_\_\_ District of Arizona.  
*(identify the person or describe the property to be searched and give its location): See Attachment A.*

The person or property to be searched, described above, is believed to conceal *(identify the person or describe the property to be seized): See Attachment B.*

I find that the affidavit(s), or any recorded testimony, have been communicated by reliable electronic means and establish probable cause to search and seize the person or property.

**YOU ARE COMMANDED** to execute this warrant on or before

May 1, 2023

*(not to exceed 14 days)*

in the daytime 6:00 a.m. to 10 p.m.  at any time in the day or night as I find reasonable cause has been established.

Unless delayed notice is authorized below, you must give a copy of the search warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave a search warrant copy and receipt at the place where the property was taken

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to United States Magistrate Judge

Any Magistrate Judge in Phoenix, Arizona  
(Name)

I find that immediate notification may have an adverse result as specified in 18 U.S.C. §3103a (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized *(check the appropriate box)*  for \_\_\_\_\_ days *(not to exceed 30)*.

until, the facts justifying, the later specific date of \_\_\_\_\_.

**Camille D Bibles**

Digitally signed by Camille D Bibles  
Date: 2023.04.19 18:02:18 -07'00'

Judge's Signature

Date and Time Issued: \_\_\_\_\_

City and State: Flagstaff, Arizona

Honorable Camille D. Bibles, United States Magistrate Judge

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<b>Return</b>		
Case No.:	Date and time warrant executed:	Copy of warrant and inventory left with:
Inventory made in the presence of :		
Inventory of the property taken and name of any person(s) seized:		
<b>Certification</b>		
I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.		
Date:	<hr/> <i>Executing Officer's Signature</i>	
<hr/> <i>Printed Name and Title</i>		

# UNITED STATES DISTRICT COURT

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District of Arizona

In the Matter of the Search of:

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The residence is listed as NHA 31 in Wetherill Heights located in  
Kayenta, Arizona with GPS coordinates 36.723981, -110.26456. )  
 ) Case No. 23-4088 mb  
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(Original To Be Filed With Court)

## ELECTRONICALLY SUBMITTED APPLICATION FOR SEARCH WARRANT

I, the undersigned, a federal law enforcement officer, request an electronic search warrant and state under penalty of perjury that I have reason to believe that on and within the following person or property:

**See Attachment A.**

located in the \_\_\_\_\_ District of \_\_\_\_\_ Arizona , there is now concealed:

**See Attachment B.**

The basis for the search under Fed. R. Crim. P. 41(c) is:

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

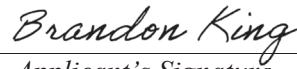
<u>Code Section(s)</u>	<u>Offense Description(s)</u>
18 U.S.C. §§ 1153 and 1201	Kidnapping
18 U.S.C. §§ 1153 and 2243	Sexual Abuse of a Minor

The application is based upon the following facts:

Continued on the attached sheet (see attached **Affidavit**).

Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days) days: \_\_\_\_\_  
is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Reviewed by: AUSA Jason Crowley

  
Brandon King  
Applicant's Signature

Pursuant to 28 U.S.C. §1746(2), I declare under penalty \_\_\_\_\_  
of perjury that the foregoing is true and correct.

Executed on: April 19, 2023

Brandon King, Special Agent, FBI  
Printed Name and Title

X Sworn by Telephone

Date/  
Time: \_\_\_\_\_

City and State: Flagstaff, Arizona

  
Camille D Bibles

Digitally signed by Camille D  
Bibles  
Date: 2023.04.19 18:01:51 -07'00'

Judge's Signature

Hon. Camille D. Bibles, United States Magistrate Judge  
Printed Name and Title

**ATTACHMENT A – PLACE/THING TO BE SEARCHED**

This warrant is to search a residence within the confines of the Navajo Nation Indian Reservation in the District of Arizona, and it is particularly described as:

A single family one story home beige in color with a brown roof. The residence is listed as NHA 31 in Wetherill Heights located in Kayenta, Arizona with GPS coordinates 36.723981, -110.26456.



**ATTACHMENT B – THINGS TO BE SEARCHED FOR AND SEIZED**

1. Any and all handguns, to include but not limited to any grey and black 9mm handguns.
2. Any ammunition to include but not limited to 9mm ammunition.
3. Any clothing on the body of J.S.
4. Any used condoms.
5. Any cellular phones/devices in the residence identified as belonging to J.S. or Stanford Young. (If recovered, separate warrants will be sought to search such devices.)
6. Indicia of ownership, occupancy, and/or use of the residence, including such things as: mail (e.g., bills) that may be addressed to the occupant(s); driver's licenses and/or identification cards; personal property such as clothing that may identify the owners and/or occupants of the structure; and photographs of the owners and/or occupants at the structure.
7. Photographs of the residence and the things seized.

UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA

**ELECTRONICALLY SUBMITTED AFFIDAVIT IN SUPPORT  
OF AN APPLICATION FOR A SEARCH WARRANT**

I, FBI Special Agent Brandon King, being first duly sworn, hereby depose and state as follows:

1. Your affiant is employed as a Special Agent (SA) for the Federal Bureau of Investigation (FBI) and has been since June of 2019. Your affiant received law enforcement training from the FBI Academy located in Quantico, Virginia and graduated in May 2019. As a FBI SA, your affiant is an investigator or law enforcement officer within the meaning of 18 U.S.C. § 2510(7). Your affiant's duties include the investigation of violent crimes occurring within Indian Country in the District of Arizona. In addition, your affiant previously served as a sworn City of Akron, Ohio police officer for approximately four years.

2. The information contained in this affidavit comes from my training and experience, and information obtained from other agents, officers, and witnesses. This Affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

## **INTRODUCTION**

3. On Saturday, April 15, 2023, a 14-year-old Navajo female with initials J.S., was forcefully removed from a residence described as five miles northwest of Chilchinbeto School, Chilchinbeto, AZ. This location is a residence on the Navajo Nation Indian Reservation, which is federally recognized as tribal land. J.S. was taken at gunpoint by Stanford “Daffy” Gene Young (DOB: 12/20/1981), herein referred to as “YOUNG”, and is believed to be currently held at Navajo Housing Authority (NHA) #31, Wetherill Heights, Kayenta, AZ 86033, GPS coordinates 36.723981,-110.26456.

4. This affidavit supports the application for a search warrant authorizing the search of the residence as listed above for J.S. who is unlawfully restrained. There is probable cause to believe that there is evidence of violations of 18 U.S.C. §§ 1153 and 1201 Kidnapping, and 18 U.S.C. §§ 1153 and 2243 Sexual Abuse of a Minor. The residence is particularly described in **Attachment A**, and the evidence being sought is particularly described in **Attachment B**. Based on your affiant’s training and experience, it is known that the Navajo Indian Tribe is a federally recognized Indian Tribe. The suspect in this case, YOUNG, is a Native American Navajo male. The victim, J.S., is a Native American Navajo female.

## **INVESTIGATION**

5. On April 19, 2023, FBI SA Patrick Burke spoke with an FBI confidential human source (CHS), who has provided reliable and verified information to the FBI on multiple incidents in the past. The CHS has received monetary compensation for information provided in the past. The CHS advised J.S. was kidnapped and being held

hostage at a residence in Wetherill Heights belonging to “Odi” (phonetic), herein referred to as ODI. The CHS provided a name and phone number for the person who initially relayed this information.

6. Next, SA Burke identified the aunt and mother of J.S., T.S. and J.B., respectively. SA Burke spoke with the aunt and mother over the phone. SA Burke learned that J.S. and YOUNG came in contact with each other because YOUNG had two children with an older sister of J.S. That older sister does not currently reside with YOUNG. T.S. and J.B. advised J.S. was taken by YOUNG over the weekend at gunpoint from a residence in Chilchinbeto, AZ. Another relative, T.P., was present and witnessed the incident and would have more information. They advised T.P. called Navajo Nation Police Department (NNPD) that night, but NNPD never arrived.

7. The following morning, Sunday, April 16, 2023, J.B. went to ODI’s residence where she believed J.S. was being held. J.B. spoke with YOUNG outside of the residence, NHA #31. J.B. demanded she see and speak with her daughter, J.S. Soon thereafter, J.S. came outside the residence to speak to her mother. However, the interaction was supervised by YOUNG.

8. J.B. requested J.S. to leave with her, but J.S. refused. J.B. believed J.S. refused to leave in fear of YOUNG and retaliation against her and her family. According to J.B., J.S. hugged her mother, J.B., for an extended period of time and cried. J.S. eventually went back into the residence with YOUNG, and J.B. left the residence. J.S. was still able to communicate with J.B. via YOUNG’s phone, telephone number (928) 981-3736. J.B. last spoke to J.S. either Monday or Tuesday (April 17 or 18) via text messaging.

9. Additionally, J.B. advised YOUNG wrote a letter to J.S. J.B. believed this was while YOUNG was incarcerated in Colorado, possibly in January 2023. According to J.B., the letter referenced previous sexual encounter(s) YOUNG had with J.S. J.B. stated she no longer has this letter, but J.B. believed YOUNG may still be sexually abusing J.S. A review of criminal history information revealed that YOUNG had been arrested for dangerous drugs and DUI in Montezuma County, Colorado on December 21, 2022 under the alias “Judd Paul Young.” Furthermore, J.B. advised she had initially moved J.S. out to this remote area in Chilchinbeto to protect her from YOUNG specifically.

10. SA Burke then spoke with the witness to the kidnapping, T.P., via telephone. T.P. said that J.S., YOUNG, and ODI arrived at the residence in Chilchinbeto on Saturday night (April 15, 2023) for J.S. to pick up some belongings and clothes. When they arrived, J.S. did not want to leave with YOUNG. An argument ensued between J.S. and YOUNG. YOUNG pushed J.S. who fell off the bed. T.P. and ODI tried to intervene. At this point, YOUNG produced what T.P. described as a gray and black metal 9mm handgun. T.P. backed off from there, and said that YOUNG threatened he and his family if he reported this to the police. T.P. did not contact police to report the incident in fear of his and his family’s safety. J.S., YOUNG, and ODI left from the residence in Chilchinbeto.

11. On April 19, 2023, J.B. rode as passenger in a vehicle with a Navajo Nation Police Department employee and confirmed the location of the residence as listed above, as the last place J.B. had physically seen J.S and known to J.B. as ODI’s residence.

**THINGS TO BE SEARCHED FOR AND SEIZED**

12. Based on the foregoing, your affiant seeks permission to search the residence described in **Attachment A** for the victim, J.S., and evidence pertaining to violations of 18 U.S.C. §§ 1153 and 1201, and 18 U.S.C. §§ 1153 and 2243.

13. The things to be searched for and seized are described further in **Attachment B**.

**CONCLUSION**

14. This affidavit is sworn telephonically before a United States Magistrate Judge legally authorized to administer an oath for this purpose.

15. Based on the information in this affidavit, your Affiant respectfully submits there is probable cause to believe that the victim, J.S., and evidence described in **Attachment B** supporting an investigation related to violations of 18 U.S.C. §§ 1153 and 1201, and 18 U.S.C. §§ 1153 and 2243, will be found in the premises described in **Attachment A**.

**Pursuant to 28 U.S.C. § 1746(2), I declare that the foregoing is true and correct to the best of my knowledge and belief.**

Brandon King  
Brandon King  
Special Agent, FBI

April 19, 2023  
Date

X Sworn by Telephone  
Date/Time: \_\_\_\_\_

**Camille D Bibles** Digitally signed by  
Camille D Bibles  
Date: 2023.04.19  
18:01:30 -07'00'  
Honorable Camille D. Bibles  
United States Magistrate Judge